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May 11, 2006

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Ex Parte Notice: Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities* – CG Docket No. 03-123

Dear Ms. Dortch:

On May 10, 2006, representatives of Telecommunications Relay Service providers met with Monica Desai, Jay Keithley, Thomas Chandler and Andrew Mulitz of the Federal Communications Commission. Present at the meeting were David Hoover of Communications Access Center; Mark Ekse of Communication Service for the Deaf (“CSD”); Karen Peltz Strauss of KPS Consulting, consultant to CSD; Mark Stern of GoAmerica, Inc.; Anne Girard of Hamilton Relay, Inc. (“Hamilton”); David O’Connor of Holland & Knight, counsel for Hamilton; George Lyon of Lukas, Nace, Gutierrez & Sachs, counsel for Hands On Video Relay Services, Inc.; Anne Rousseau of Nordia, Inc.; Grace Koh of Willkie Farr & Gallagher, counsel for Snap Telecommunications, Inc.; Ron Burdett and Mike Maddix of Sorenson Communications, Inc. (“Sorenson”); the undersigned, counsel for Sorenson; Michael Fingerhut of Sprint Nextel Corporation; and Rich Ellis and Tiina Keder of Verizon. Attending the meeting by telephone were Gail Sanchez and Toni Acton of AT&T Inc.; Dixie Ziegler of Hamilton; and Sherry Ingram of Verizon.

The purpose of the meeting was to express concerns regarding the “Interstate Telecommunications Relay Services Fund Payment Formula and Fund Size Estimate” that the National Exchange Carrier Association (“NECA”) filed in the above-captioned docket on May 1, 2006. In particular, the parties discussed the flawed process by which NECA arrived at its proposed telecommunications relay service rates for the 2006-07 funding year, and the failure of NECA to propose rates for 2006-07 that allow providers of IP Relay and video relay service (“VRS”) to recover costs associated with conducting reasonable marketing and outreach events, hiring and training certified deaf interpreters, and meeting new requirements and quality objectives. The attached handouts regarding

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certified deaf interpreters and previous Commission statements on outreach were provided to the FCC staff.

Pursuant to the Commission's rules, this letter is being submitted for inclusion of the public record in the above-referenced proceeding.

Sincerely,

/s/ Ruth Milkman
Ruth Milkman

Attachments

cc: Monica Desai
Jay Keithley
Thomas Chandler
Andrew Mulitz

CERTIFIED DEAF INTERPRETERS IN VIDEO RELAY SERVICES

POSITION:

Hands On Video Relay Service believes an increase in the VRS rate, to include Certified Deaf Interpreters (CDIs) in Video Relay Service (VRS), is needed to ensure functional equivalent telecommunications services for all Deaf and Hard of Hearing Americans.

Issue:

The current VRS rate structure does not calculate the use of CDIs in VRS. CDIs are necessary for VRS providers to impart equal access to a certain population of Deaf /Hard of Hearing Americans. Deaf/Hard of Hearing individuals who: have minimal or limited communication skills, use idiosyncratic non-standard signs or gestures, use signs particular to a given region, ethnic or age group or have characteristics reflective of Deaf culture not familiar to communication assistants (CAs) are not receiving the “functional equivalency” standard of the Americans with Disabilities Act (ADA).

FACTS:

- Deaf/Hard of Hearing persons from around the country, with different regional and language abilities are utilizing VRS. In such situations, CAs are not ‘qualified interpreters’ as defined in the Mandatory Minimum Standards for Provision of VRS as set forth in 47 C.F.R. 64.604: *qualified to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary.*
- As native sign language users, CDI are experts in general sign language communication skills and have specialized training in use of gesture, mime, and other tools to enhance communication. CDIs are the authority when working with such specialized populations. CDIs are needed to comply with the Mandatory Minimum Standards for Providers of VRS as set forth in 47 C.F.R 64.604 which states: *TRS (VRS) providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.*
- A CDI and a qualified hearing interpreter team in VRS settings assures compliance of the American with Disabilities Act (ADA); section 151 of this title states: *to make available to all individuals in the United States a rapid, efficient nationwide communication service, ...to the extent possible and in the most efficient manner, to hearing-impaired and speech-impaired individuals in the United States.*



Ontario Interpreter Services Guidelines for Deaf Interpreters

Role of the Deaf Interpreter

A Deaf interpreter (DI) uses American Sign Language (ASL), gesture, mime and/or other communication strategies to facilitate communication between a Deaf consumer, a hearing consumer and a hearing interpreter. A Deaf interpreter is a Deaf individual who has native or near-native fluency in American Sign Language, who has interpreting experience and who has taken specialized training.

A Deaf interpreter will function as a member of the interpreting team. This may be needed if a Deaf person uses signs that are: particular to a region or age group, has minimal or limited communication skills, has had their communication hindered or altered because of sickness or injury, or uses non-standard ASL or gestures. A Deaf interpreter may be called upon when it is determined that a Deaf person is likely to be able to present concepts in a more comprehensible way because of shared culture and life experience. In some cases this is not always possible for hearing ASL-English interpreters.

The AVLIC Code of Ethics and Guidelines for Professional Conduct will guide the Deaf interpreter. The role of the Deaf interpreter is not to provide counselling or advocacy. The Deaf interpreter will ensure that the interpretation provided will be accurate and faithful to the intent of the participants in the conversation.

Interpreting Process – A Team Model

In the interpreting process, interpreters receive the message in one language, process it, taking linguistic and cultural information into account, and then produce the interpreted message into the other language. A time lag will be experienced as the message is passed between the parties involved.

An OIS registered Deaf interpreter will work with an OIS registered hearing interpreter in a team model. The hearing interpreter will interpret from spoken English to ASL. The Deaf interpreter will then interpret from ASL to an appropriate level of ASL and/or will incorporate different communication strategies to convey the message to the Deaf consumer. The Deaf interpreter will interpret the Deaf consumer's remarks into ASL. The hearing interpreter will then interpret from ASL into spoken English. The Deaf and hearing interpreters may consult with each other in order to arrive at the best interpretation.

Consumers will be encouraged to address each other directly and not to address the interpreters. Hearing consumers should maintain eye contact with the Deaf consumer, not the interpreters.

The interpreters will advise the participants on how best to work with the team. This may include: allowing more time for the interpreting process, requiring the speaker to moderate the pace of their speech, appropriate seating arrangements, etc.

A Deaf/hearing interpreter team often can communicate more effectively than a hearing interpreter alone, or than a team of two hearing interpreters, or than a Deaf interpreter working alone.

When there are two hearing interpreters, two Deaf interpreters are required.

Benefits of using a Deaf Interpreter:

- Optimal understanding by all parties
- Efficient use of time and resources
- Clarification of linguistic and/or cultural information to reduce misunderstanding(s)

Deaf consumers who may require a Deaf interpreter:

- Deaf immigrants
- Deaf persons who have been socially isolated (ie. From rural areas, inmates of mental facilities or prisons)
- Deaf Plus (mentally ill, developmentally delayed, educationally deprived)
- A Deaf person who is not comfortable with hearing people
- A Deaf person who is seriously ill, injured or dying (the Deaf person's ability to produce signs clearly or use both arms when signing may be affected)
- Deaf children who have not been exposed or who may have had limited exposure to English and/or ASL

A Deaf interpreter is highly recommended in situations where misunderstandings can result in especially serious outcomes. Deaf interpreter services should be used in the courts, where a person could be wrongly convicted, by the police when interviewing victims, witnesses or suspects who are Deaf, or in mental health settings where clear and accurate communication assists professionals in determining correct medication or other interventions. Children's Aid Society workers may need to use the services of a Deaf interpreter to ensure children are thoroughly protected.

If a hearing interpreter or a Deaf consumer requests the services of a Deaf interpreter, every effort will be made to provide this service.

OIS Registration

Deaf Interpreters wishing to register with OIS must have the following qualifications:

- *Sociolinguistics of ASL* (to know/understand ASL)
i.e., courses can be taken through Ontario Cultural Society of the Deaf (OCSD)
or The Canadian Hearing Society (CHS)
- *Indepth knowledge of Deaf culture*
- *Knowledge of the Role of the Deaf interpreter*
Adherence to the AVLIC Code of Ethics and Guidelines for Professional
Conduct

Understand the process of teaming with a hearing interpreter
- *Experience*
Experience working as a professional Deaf interpreter and/or training as a Deaf
interpreter through courses or workshops
- *Successful completion of an OIS knowledge and Attitude Interviews*
Understanding of the interpreting process. Knowledge of AVLIC Code of Ethics
and Guidelines for Professional Conduct
- *English as a second language*

Candidates wishing to work as Deaf interpreters will be interviewed in the region in which they will work by the Regional Director (RD) or manager and a committee comprised of a minimum of 2 Deaf community representatives and the staff interpreter.

Candidates will provide the Regional Director with a resume and references.

On successful completion of the interview an OIS Freelance Interpreter contract will be signed and ID card will be issued by the Provincial OIS office.

The registration process will be conducted once every 3 years.

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New York City Metro RID, Inc.



Information on Deaf Interpreters

Deaf Interpreters

Not all Deaf consumers communicate using either American Sign Language (ASL) or English-like signing. Some Deaf consumers come from other countries and are more familiar with their country's sign language than with ASL. Others, for a variety of reasons, may communicate in a more idiosyncratic system of gestures and "home signs". In these situations, the skills of professionally trained hearing interpreters may not be sufficient to ensure accurate communication.

If this is the case, it is customary to contract a team (or teams) of hearing and Deaf interpreters. The hearing interpreters interpret between spoken English and ASL. The Deaf interpreters negotiate between ASL and the communication system of the Deaf consumer.

Deaf and hearing interpreting teams may be hired to work in any setting including: court, medical settings, conferences, etc.

Interpreter's Corner

Lore Lyon Rosenthal
Philadelphia, PA



Deaf/Hearing Team Interpreters

Since October of 1998, I have become a full-time 'free lance' interpreter. That means I am finally getting a taste of the secular interpreting world. This month I would like to discuss a topic that is not specifically related to Jewish Interpreting: Deaf/Hearing Team Interpreters.

Here in Philadelphia, both Interpreter Referral Services have a policy which requires the use of a Deaf and Hearing Team for all Legal and Mental Health Situations. A Deaf Team member may also be used in other situations where it is determined that the Hearing Interpreter may need additional assistance.

For those who are not familiar, in a Deaf/Hearing Team, in effect, the Hearing Interpreter works most closely with the Hearing 'Consumer' while the Deaf Interpreter works with the Deaf Consumer. So for example, in a doctor's office, the doctor will convey the message to the Hearing Interpreter who signs to the Deaf Interpreter. The Deaf Interpreter then repeats the information for the Deaf Consumer. When the Deaf Consumer responds in sign language to the Deaf Interpreter, he/she rephrases the response to the Hearing Interpreter, who then 'voices' what the Deaf Interpreter has signed.

Although on paper this set up may look awkward, in real life it works very smoothly and effectively. The Hearing Interpreter is able to spend more time attending to the Hearing Consumer (doctor), so the doctor doesn't feel left out. The Deaf Interpreter is able to Condo with the Deaf Consumer (patient) so he/she feels more at ease.

As a Hearing Team Interpreter, I am always in awe of my Deaf teammate. It is wonderful to watch my sign message repeated and elaborated upon to make sure the Deaf Consumer fully understands. It is also amazing to see how much more comfortable the Deaf Consumer looks and how much more elaborate his/her answers become. Although several doctors I have worked with have been "resistant" in the beginning (we never needed this before . . .), by the end of the appointment, they appreciate how much more information they were able to gain from their deaf patient.

Deaf/Hearing Team interpreters can also be used in platform interpreting situations. The Hearing Interpreter will sit in the front row and "feed" the lecture/presentation to the Deaf Interpreter, who signs in ASL to the audience. M. J. Bienvenu is well known for doing this at national RID Conventions.

Similarly, I have seen Deaf/Hearing Teams used in a synagogue setting. Again the Hearing Interpreter "cues" the Deaf Interpreter/Prayer Leader who is then able to lead the Deaf Congregants. Maria Berkowitz and Rabbi Chaim Tzvi Kakon have both used this technique very effectively.

If you have any experience BEING a Deaf/Hearing Team Interpreter or USING a Deaf/Hearing Team, feel free to share your comments by e-mail at LORELYON@aol.com

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USE OF CERTIFIED DEAF INTERPRETERS

CODE OF ETHICS

In an effort to protect and guide interpreters transliterators, and consumers, Registry of Interpreters for the Deaf ("RID") members established principles of ethical behavior. The organization enforces this Code of Ethics through its national Ethical Practices System. Underlying these principles is the desire to ensure for all the right to communicate.

This Code of Ethics applies to all members of the Registry of Interpreters for the Deaf, Inc. and to all certified non-members.

1. Interpreters/translitterators shall keep all assignment-related information strictly confidential.
2. Interpreters/translitterators shall render the message faithfully, always conveying the content and spirit of the speaker using language most readily understood by the person(s) whom they serve.
3. Interpreters/translitterators shall not counsel, advise or interject personal opinions.
4. Interpreters/translitterators shall accept assignments using discretion with regard to skill, setting, and the consumers involved.
5. Interpreters/translitterators shall request compensation for services in a professional and judicious manner.
6. Interpreters/translitterators shall function in a manner appropriate to the situation.
7. Interpreters/translitterators shall strive to further knowledge and skills through participation in workshops, professional meetings, interaction with professional colleagues, and reading of current literature in the field.
8. Interpreters/translitterators, by virtue of membership in or certification by RID, Inc., shall strive to maintain high professional standards in compliance with the Code of Ethics.

Benefits of Using a Certified Deaf Interpreter are:

- Optimal understanding by all parties
- Efficient use of time and resources
- Clarification of linguistic and/or cultural confusion and misunderstanding(s)
- Arrival at a clear conclusion in the interpreting situation.

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8630 Fenton Street, Suit e324
Silver Spring, MD 20910
301-608-0050 (v/tty)/ 301-608-0562 (tty) / 301-608-0508 (fax)

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Written by Professional Standards Committee, 1995-1997. REV8/97

USE OF CERTIFIED DEAF INTERPRETERS

A Certified Deaf Interpreter (CDI) is an individual who is deaf or hard of hearing and has been certified by the Registry of Interpreters for the Deaf as an interpreter.

In addition to excellent general communication skills and general interpreter training the CDE may also have specialized training and/or experience in use of gesture, mime, props, drawings, and other tools to enhance communication. The CDI has an extensive knowledge and understanding of deafness, the deaf community, and/or Deaf culture which combined with excellent communication skills, can bring added expertise into both routine and uniquely difficult interpreting situations.

A Certified Deaf Interpreter may be needed when the communication mode of a deaf consumer is so unique that it cannot be adequately accessed by interpreters who are hearing. Some such situations may involved individuals who:

- *Use idiosyncratic non-standard signs or gestures such as those commonly referred to as "home signs" which are unique to a family*
- *Use a foreign language*
- *Have minimal or limited communication skills*
- *Are deaf-blind or deaf with limited vision*
- *Use signs particular to a given region, ethnic or age group*
- *Have characteristics reflective of Deaf Culture not familiar to hearing interpreters.*

As a Team Member

Often a Certified Deaf Interpreter works as a team member with a certified interpreter who is hearing. In some situations, a CDI/hearing interpreter team can communicate more effectively than a hearing interpreter alone or a team of two hearing interpreters or a CDI alone. In the CDI/hearing interpreter team situation, the CDI transmits message content between a deaf consumer and a hearing interpreter; the hearing interpreter transmits message content between a deaf consumer and a hearing interpreter; the hearing interpreter transmits message content between the CDI and a hearing consumer. While this process resembles a message relay, it is more than that. Each interpreter receives the message in one communication mode (or language), processes it linguistically and culturally then passes it on in the appropriate communication mode. In even more challenging situations, the CDI and hearing interpreter may work together to understand a deaf individual's message, confer with each other to arrive at their best interpretation, then convey that interpretation to the hearing party.

For Deaf-Blind Individuals

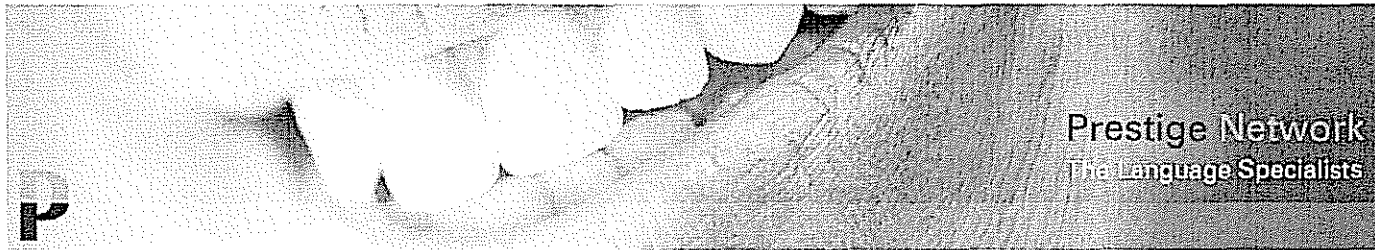
When a consumer who is deaf-blind is involved, the CDI may receive a speaker's message visually, then relay it to the deaf-blind individual through the sense of touch or at close visual range. This process is not a simple relay in which the CDI sees the signs and copies them for the person who is deaf-blind. The CDI processes the message, then transmits it in the mode most easily understood by the individual who is deaf-blind.

Solo

The CDI sometimes works as the sole interpreter in a situation. In these instances, the CDI may use sign language or other communication modes that are effective with a particular deaf individual; and may use, with the hearing consumer, a combination of speech, speech reading, residual hearing, and written communication.

On the platform

The CDI sometimes functions as Interpreter before an audience. This may involve the CDI watching a hearing interpreter and restating the message to the audience in a different sign mod. At other times, the CDI may be in front of the audience to "mirror" comments or questions from a signing member of the audience so that the rest of the audience can see them.


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Deaf Interpreter

Our British Sign Language interpreters can bridge the communication barrier for people with hearing difficulties. Their skills and expertise provide full translation to convey not only the meaning of the words but also the feelings behind the words which are so often vital when we interact. Our efficient and friendly service will find an interpreter to suit your needs whether you are an individual or an organisation in the public or private sector.



A **deaf interpreter** is essentially a person who would translate a language to sign language so that deaf or hard of hearing people can also be a part of the dialogue. We use British Sign Language at Prestige Network and we are committed to assisting those that are either deaf or hard of hearing communicate thus ensuring that there are no barriers and no confusion. A professional interpreter or a professional translator will perform these tasks ensuring that you as our valued customer receives the best translation services.

A qualified interpreter or a qualified translator is the key to fluent interpretation. British Sign Language will bridge the language barrier between the deaf or hard of hearing and those that can hear one hundred percent. Other services include simultaneous translation, simultaneous interpreting, bilingual voiceover, bilingual voice recording, multilingual translation, multilingual voice recording, multilingual voiceover, multilingual project management and multilingual desk top publishing.

Our web site translation is performed by helpful staff monitored by an experienced manager at all times. All our work is consolidated by staff and managers who are quality-minded; strictly quality controlled interpretation systems are in place ensuring that you receive only first rate translations and within a quick turnaround time too. Our team of friendly staff ensure that you receive excellent translations at competitive prices. British sign language is what the *deaf interpreter* will make use of when interpreting a language for someone who is hard of hearing. It is actually a language all of its own and includes hand movements, facial expressions as well as body language. It is a very full bodied and detailed way of expressing yourself.

It might surprise you that as little as twenty years ago, deaf children's parents were encouraged not to allow their hard of hearing offspring to make use of sign language. It was seen as the sure way to ruin a deaf child's opportunities to eventually learn to speak or learn how to lip read. But it is now widely accepted as the vital way a deaf child learns how to properly communicate. An experienced translator is the key and a deaf interpreter must possess all the necessary skills in performing the correct interpretations at all times. A bilingual interpreter or a bilingual translator is exactly what you need if you want quality to filter through to all your professional language services.

A deaf interpreter will basically be the link between a deaf person and people that can hear properly without assistance. As well as translating what the words mean, a professional interpreter will also transfer the feelings of the words as well.

British sign language is the starting language of many hard of hearing individuals. It is commonly known as BSL, and is actually its own language altogether. A deaf interpreter must be one hundred percent fluent in British sign language to be able to translate it properly, or the translation will be pointless.

The services of a deaf interpreter will be used for many occasions, from a wedding to a job interview, a doctor or optometrist session or ante-natal classes to business consultations and so on. The possibilities are endless and the services of a deaf interpreter can be used for virtually any thing at all depending on the occasion.

All our interpreters are professionally qualified and all their work is one hundred percent correct. They will also remain on neutral ground in all the work they do. In addition to that, all the work they perform will remain one hundred percent confidential. The sign language interpretation that our deaf interpreter will perform will be of the highest quality done to the best of their professional ability. Their main aim is to bridge the gap between the deaf or hard of hearing and the hearing groups accurately and efficiently. They will work extremely accurately and quickly, offering you the best service they can. It is important that the deaf interpreter you choose understands the importance of the interpretation being correct.

Prestige Network is the best language specialist you can choose, offering a deaf interpreter for all your sign language requirements. British sign language must be performed one hundred percent accurately if you require it.

Previous Commission Statements Regarding the Importance of Outreach

“We are convinced that this rule [requiring publication of information about TRS in directories] has not effectively ensured that callers are aware of TRS, and that the lack of awareness adversely affects the quality of TRS. . . . TRS users find it difficult to communicate with callers who are unaware of the existence of TRS. Callers using a relay service experience an alarming number of hang-ups by people receiving the TRS call who are not familiar with, and do not understand, the service. . . . [M]any employment opportunities are not extended to individuals with hearing disabilities because employers are uncomfortable using, or are unwilling to use, TRS for normal business transactions. . . . [T]he current rule obligates carriers to assure that ‘callers’ in their service areas are aware of TRS. The term ‘callers’ refers to the general public, not just consumers with speech and hearing disabilities.”

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 5140, ¶¶ 104-105 (2000).

“It is crucial for everyone to be aware of the availability of TRS for it to offer the functional equivalence required by the statute. As Congress has stated, TRS was designed to help bridge the gap between people with hearing and speech disabilities and people without such disabilities with respect to telecommunications services. The lack of public awareness prevents TRS from achieving this Congressionally mandated objective.”

Id. ¶ 105.

“We recognize that outreach is an issue of recurring and serious importance for TRS users. Those who rely on TRS for access to the nation's telephone system, and thereby for access to family, friends, businesses, and the like, gain little from the mandate of Title IV if persons receiving a TRS call do not understand what a relay call is and therefore do not take the call, or if persons desiring to call a person with a hearing or speech disability do not know that this can easily be accomplished through TRS (and dialing 711). We also recognize the strong sentiment reflected in the comments that outreach efforts to date have not been adequate.”

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, ¶ 95 (2004).

“[C]onsumer education, training and outreach are essential to the success of TRS.”

Telecommunications Relay Services, the Americans with Disabilities Act of 1990, and the Telecommunications Act of 1996, Notice of Inquiry, 12 FCC Rcd 1152, ¶ 45 (1997).

“We . . . encourage carriers, relay providers, relay centers, and states to institute the most creative and wide-spread advertising campaign possible.”

Use of N11 Codes and Other Abbreviated Dialing Arrangements, Second Report and Order, 15 FCC Rcd 15188, ¶ 64 (2000).

“In order to ensure the efficient, effective, and successful use of 711 access to TRS, we require carriers, in cooperation with relay providers and the states, to engage in on-going and comprehensive education and outreach programs to publicize the availability of 711 access in a manner reasonably designed to reach the largest number of consumers possible. We recognize that a method that is reasonably designed to reach the largest number of consumers in one state or location may not be equally effective in another location. . . . To the extent costs of education and outreach are attributable to the provision of interstate TRS, . . . relay providers should include these costs as part of their annual data report of their total TRS operating expenses.”

Id. ¶ 61.

“While carriers must continue to utilize bill inserts and provide information in telephone directories . . . we also encourage carriers, states, and relay providers to disseminate information through the mainstream media, including newspaper, radio, and television advertisements and articles, which can more effectively reach substantial portions of the American public. Additionally, we encourage the dissemination of information about 711 access through conferences and membership publications of individuals who are deaf, hard of hearing or have speech disabilities, and of senior citizens, to reach significant segments of the population who could benefit from relay services.”

Id. ¶ 62.

Compensation rates from the Interstate TRS Fund “may include costs attributable to reasonable outreach efforts.”

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, ¶ 97 (2004).

“[T]he Commission's work [is] to ensure that all Americans have full access to communications and emergency services.”

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, Statement of Chairman Kevin J. Martin on Declaratory Ruling and Further Notice of Proposed Rulemaking (May 3, 2006), *available at*: <http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-265218A2.pdf>.

“The Americans with Disabilities Act charges the Commission with doing everything we can to ensure that people with disabilities have access to functionally equivalent [to the non-disabled] services.”

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, Statement of Commissioner Michael J. Copps on Declaratory Ruling and Further Notice of Proposed Rulemaking (May 3, 2006), *available at*: <http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-265218A3.pdf>.